

District Judge Tana Lin

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FARTUN A. MAALIN *et al.*,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, *et al.*,

Defendants.

No. 2:21-cv-1700-TL

STIPULATED MOTION TO HOLD
CASE IN ABEYANCE AND
~~PROPOSED~~ ORDER

Noted for Consideration on:
October 28, 2022

Plaintiffs and Defendants, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to continue to stay these proceedings for forty-five days. The case is currently stayed. Dkt. No. 26. The parties continue to work diligently towards a resolution to this litigation.

Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ. P. 1.

1 Plaintiffs report that the United Nation's International Organization for Migration ("IOM")
2 performed the beneficiary's medical exam on October 17, 2022. The State Department recently
3 received the beneficiary's results. If the beneficiary remains qualified, a travel foil will be issued
4 for the beneficiary. IOM can then make travel arrangements. Therefore, the parties believe good
5 cause exists to continue the stay in these proceedings to save the parties from spending unnecessary
6 time and judicial resources on this matter.

7 Accordingly, the parties jointly stipulate and request that the Court stay these proceedings
8 for forty-five days. The parties will submit a joint status report on or before December 16, 2022.

9 Dated: October 28, 2022

10 Respectfully submitted,

11 NICHOLAS W. BROWN
12 United States Attorney

13 s/Michelle R. Lambert
14 MICHELLE R. LAMBERT, NYS #4666657
15 Assistant United States Attorney
16 United States Attorney's Office
17 1201 Pacific Avenue, Suite 700
Tacoma, Washington 98402
Phone: 206-428-3824
Email: michelle.lambert@usdoj.gov
Attorneys for Defendants

18 s/Jane Marie O'Sullivan
19 JANE MARIE O'SULLIVAN
20 WSBA#34486
21 O'Sullivan Law Office
22 2417 Pacific Avenue SE, 2nd Floor
Olympia, Washington 98501
Phone: 206-340-9980
Email: jane@osullivanlawoffice.com
Attorney for Plaintiffs

~~PROPOSED~~ ORDER

The parties having stipulated and agreed, it is hereby so ORDERED. The parties shall file a joint status report on or before December 16, 2022.

DATED this 31st day of October, 2022.



Tana Lin
United States District Judge